

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re application of: Kwasniewski et al.

Serial No.: 10/647,171

Group Art Unit: 3625

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Examiner: Airapetian, M.

For: System for Processing Applications for Manufacture of Vehicle Parts

Atty. Dkt. No.: 060680-0710

Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

**APPEAL BRIEF PURSUANT TO 37 C.F.R. § 41.37**

Dear Sir:

Appellants submit the following Appeal Brief pursuant to 37 C.F.R. § 41.37 for consideration by the Board of Patent Appeals and Interferences. Please charge the cost of filing the opening brief, namely \$510.00, as required under 37 C.F.R. § 1.17(c), to deposit account 04-2223. Further, please charge any additional fees required or credit any overpayment to the same deposit account.

**CERTIFICATE OF TRANSMISSION VIA EFS-WEB**

I hereby certify that this Appeal Brief is being transmitted to the United States Patent and Trademark Office via the Office's electronic filing system EFS-Web addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the 22<sup>nd</sup> day of October 2007.

/William F. Kolakowski III/

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**I. REAL PARTY IN INTEREST**

Dana Corporation is the assignee of all rights in this invention and is the real party in interest.

**II. RELATED APPEALS AND INTERFERENCES**

Neither Appellants, Appellants' representatives, nor Dana Corporation (the assignee) knows of any appeal, interference or judicial proceeding that may be related to, that will directly affect or that will be directly affected by or have a bearing on the Board's decision in the present appeal.

**III. STATUS OF CLAIMS**

Claims 1-33 are presently pending in this application. Claim 12 stands objected to.<sup>1</sup> Claims 1-11 and 13-33 stand rejected. The rejection of claims 1-11 and 13-33 is being appealed.

**IV. STATUS OF AMENDMENTS**

No amendment has been filed subsequent to the final rejection.

**V. SUMMARY OF CLAIMED SUBJECT MATTER**

This invention relates to a system (20—Fig. 1) for processing applications from customers for manufacture of vehicle parts by a manufacturer.<sup>2</sup> The system (20—Fig. 1)

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<sup>1</sup> The Office Action of May 22, 2007 recites a rejection of claim 12 at pages 6-7 of the Office Action. The Office Action also states, however, that claim 12 recites allowable subject matter at page 25 of the Office Action and on the Office Action Summary. Applicant assumes that the rejection of claim 12 recited at pages 6-7 (which is copied from a prior Office Action) was inadvertently included and that claim 12 is only objected to as stated in the Office Action summary. Applicant has therefore not included any arguments directed to claim 12.

includes a first server (22—Fig. 1) configured to generate an application interface (52—Figs. 6-10) on a customer client (38—Fig. 1) in communication with the first server (22—Fig. 1) through a first network (40—Fig. 1).<sup>3</sup> The first server (22—Fig. 1) is further configured to receive a first completed application for manufacture of a first part of a vehicle from the customer through the customer client (38—Fig. 1) using the application interface (52—Figs. 6-10).<sup>4</sup> The completed application has information including a first set of information regarding operating conditions of the vehicle, a second set of information defining specifications for the first part, and a third set of information regarding a second part of the vehicle functionally interrelated with the first part of the vehicle.<sup>5</sup>

## **VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

1. The rejection of claims 1-2 and 29-30 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”).

2. The rejection of claim 3 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of

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<sup>2</sup> See Specification at page 1, lines 5-7, page 2, lines 2-4, page 3, lines 22-27.

<sup>3</sup> See Specification at page 2, lines 5-7 and page 3, line 26 to page 5, line 22; page 6, lines 9-15; page 8, lines 7-12

<sup>4</sup> See Specification at page 2, lines 7-10, page 8, lines 12-15.

<sup>5</sup> See Specification at page 2, lines 10-15; page 11, line 10 to page 12, line 2.

U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2005-0138216 (“Giles”).

3. The rejection of claims 10-16 and 26 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2004-0030614 (“Shields et al.”).

4. The rejection of claims 17-19 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2004-0243588 (“Tanner et al.”).

5. The rejection of claims 21-25 and 31-33 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2003-0004825 (“Olson et al.”).

6. The rejection of claims 27-28 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2004-0030614 (“Shields et al.”) and further in view of U.S. Published Patent Application No. 2003-0004825 (“Olson et al.”)

7. The rejection of claims 8-9 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2003-0115142 (“Brickell et al.”).

8. The rejection of claims 4-5 and 7 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Patent No. 6,832,202 (“Schuyler et al.”).

9. The rejection of claim 6 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Patent No. 6,832,202 (“Schuyler et al.”) and further in view of U.S. Published Patent Application No. 2002-0072998 (“Haines et al.”)

10. The rejection of claim 20 as unpatentable under 35 U.S.C. § 103(a) over U.S. Published Patent Application No. 2002-0099588 (“Utsugi et al.”) in view of U.S. Published Patent Application No. 2003-0004768 (“Bury et al.”) and further in view of U.S. Published Patent Application No. 2001-0049644 (“Webb et al.”) and further in view of U.S. Published Patent Application No. 2002-0040328 (“Reichwein et al.”).



## VII. ARGUMENTS

Claims 1-11 and 13-33 stand rejected as being unpatentable under 35 U.S.C. § 103(a). Appellants respectfully submit that the rejections of claims 1-11 and 13-33 under 35 U.S.C. § 103(a) is improper because the combinations of references fail to disclose or suggest all of the limitations set forth in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

“Patent examiners carry the responsibility of making sure that the standard of patentability enunciated by the Supreme Court and by the Congress is applied in each and every case.” MPEP § 2141 (emphasis in original).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations.

MPEP § 2143. Appellants respectfully submit that the rejection of claims 1-11 and 13-33 under 35 U.S.C. § 103(a) is improper because there the combinations of references cited by the Examiner fail to disclose or suggest all of the limitations set forth in the claims and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references.

### A. Rejection of Claims 1-2 and 29-30

Claims 1-2 and 29-30 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644). Applicant respectfully submits that the rejection of claims 1-2 and 29-30 under 35 U.S.C. § 103(a) is improper because the

combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

### **1. Rejection of Claim 1**

Independent claim 1 recites:

1. A system for processing applications from customers for manufacture of vehicle parts by a manufacturer, comprising:

a first server configured to generate an application interface on a customer client in communication with said first server through a first network and to receive a first completed application for manufacture of a first part of a vehicle from said customer through said customer client using said application interface, said first completed application having information including a first set of information regarding operating conditions of said vehicle, a second set of information defining specifications for said first part, and a third set of information regarding a second part of said vehicle functionally interrelated with said first part of said vehicle.

Applicant respectfully submits that the combination of Utsugi et al., Bury et al. and Webb et al. does not disclose a system meeting the above-recited limitations.

Utsugi et al. disclose an order processing system. An orderer 3 (i.e., a customer) places an order with an order receiver 1 who in turn places an order with a manufacturer 4. Utsugi et al. state that the orderer 3 communicates with the order receiver by “international network system” or by “facsimile or telephone” See, e.g., Utsugi et al. ¶¶ [0068]-[0069]. Utsugi et al. state that the order receiver 1 communicates with the manufacturer 4 through a “WAN.” See, e.g., Utsugi et al. ¶ [0076]. From these simple disclosures alone, the Examiner concludes that Utsugi et al. disclose “a first server,” that the server is “configured to generate an application interface on a customer client in communication with the first server” and that the server is further configured to “receive a first completed application for manufacture of a first part of a vehicle from said

customer through said customer client using said application interface”. Office Action of May 22, 2007 p. 2. Applicant respectfully submits that Utsugi et al. does not disclose a system meeting the recited limitations in claim 1.

Applicant first notes that the WAN in Utsugi et al. cited by the Examiner is used for communication between the order receiver 1 and the manufacturer 4. Utsugi et al. does not disclose the use of a WAN between the orderer 3 (i.e., the customer) and the order receiver 1. Utsugi et al. says nothing more about the nature of the order from the orderer 3 (the customer) other than that the order can be placed over an “international network system” or by “facsimile or telephone” See, e.g., Utsugi et al. ¶¶ [0068]-[0069]. Thus, Applicant submits that the Examiner’s citation to Utsugi et al.’s use of a WAN is unsupported in the first instance because there is no disclosure at all that the customer would send communications over a WAN.

Applicant notes that the Examiner may alternatively be arguing that the order receiver 3 is, in essence, the “customer,” given the Examiner’s citation to Utsugi’s use of a WAN. Even assuming *arguendo* that this construction is appropriate, Applicant submits that the simple recitation of a “WAN” and/or an “international network system” does not disclose or suggest the specific limitations recited in claim 1. First, the use of a “WAN” does not inherently disclose or suggest the use of a client-server architecture as recited in claim 1. Instead communications over a WAN could alternatively be made on peer to peer networks or another network configuration in which no servers are required. Second, there is absolutely no indication that any purported client-server architecture would “generate an application interface on a customer client in communication with said first server” or “receive a first completed application....using said application interface.”

There is absolutely no disclosure of an “application interface” and orders could, in theory, be placed over a WAN in any number of ways—including by simple text email requests. Applicant submits that the Examiner has stretched the disclosure beyond acceptability in arguing that the use of WAN inherently discloses a client-server architecture as recited in claim 1. Further claiming that the use of “WAN” alone also inherently discloses a configured server that “generates” and “receives” an “application interface” is beyond credible.

Applicant also submits that one of ordinary skill in the art would not combine the teachings of Bury et al. with those of Utsugi et al. and/or Webb et al. In particular, Bury et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant’s invention, the reference must either be in the field of applicant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant’s claimed invention relates to ordering of vehicle parts for manufacture. Bury et al. is directed to a system for estimating manufacturing costs for parts. Bury et al. is also not reasonably pertinent to the problem with which Applicant was concerned. While Applicant’s invention is directed towards improved efficiency in orders for manufacture of vehicle parts, Bury et al. is directed towards providing cost and weight estimates for manufactured parts without requiring in-depth knowledge of the manufacturing process for the part. See Bury et al. ¶ [0006].

Applicant also notes that the Examiner's stated motivation for combining the teachings of Bury et al. with Utsugi et al. (i.e. "information about the parts specification would allow to quickly cross reference between parts thereby helping the user to accurately access information about authentic parts" Office Action of May 22, 2007 p 3, lines 9-13) has nothing whatsoever to do with Bury et al. Rather, the statement was blocked copied from the first Office Action in the application and relates to an entirely different reference that was previously cited by the Examiner. See Office Action of February 9, 2006 p. 3. Applicant respectfully submits that one of ordinary skill in the art would have no motivation to modify Utsugi et al. based on the teachings of Bury et al. as suggested by the Examiner.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in independent claim 1 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 1 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 1 under 35 U.S.C. § 103(a) be overturned.

## **2. Rejection of Claim 2**

Claim 2 depends from independent claim 1 and therefore incorporates all of the limitations recited in claim 1. For the reasons stated hererinabove in Section VII.A.1, therefore, Applicant submits that the rejection of claim 2 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned. Applicant further submits that claim 2 recites patentable subject matter apart from its dependence on claim 1.

Claim 2 recites “...a second server in communication with said first server over one of said first network and a second network...” As set forth in Section VII.A.1, Utsugi et al. does not expressly or inherently disclose or suggest a client-server system—much less a system meeting the particular requirements of claim 1 or claim 2. Utsugi et al. therefore cannot meet the limitation recited in claim 2 of “a second server in communication with said first server over one of said first and network and a second network.”

Claim 2 also recites “...a database that stores said information, said database accessible by said second server....” The “information,” as defined in claim 1, relates to orders for manufacture of vehicle parts. The database identified by the Examiner in Utsugi et al. (See Office Action of May 22, 2007, p. 4, lines 3-6) does not store information regarding orders for manufacture of parts as recited in claim 2. Instead the database stores information relating to “supply capacity data of a plurality of associates that supply parts”. See Utsugi et al. ¶ [0045]. In order words, the database identified by the Examiner in Utsugi et al. stores information relating to each supplier’s ability to fill orders—not information relating to orders for manufacture of parts as recited in claim 2.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 2 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 2 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 2 under 35 U.S.C. § 103(a) be overturned.

### **3. Rejection of Claims 29-30**

Claims 29-30 depend from independent claim 1 and therefore incorporates all of the limitations recited in claim 1. For the reasons stated hererinabove in Section VII.A.1, therefore, Applicant submits that the rejection of claims 29-30 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned. Applicant further submits that claims 29-30 recite patentable subject matter apart from their dependence on claim 1.

Claim 29 further recites “a manufacturer client in communication with said first server over one of said first network and a second network.” Claim 30 depends from claim 29 and further recites “wherein said first server transmits an application notification to said manufacturer client upon receipt of said first completed application.” As set forth in Section VII.A.1, Utsugi et al. does not expressly or inherently disclose or suggest a client-server system—much less a system meeting the particular requirements of claim 1 or claims 29-30. Utsugi et al. therefore cannot meet the limitations recited in claims 29-30.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claims 29-30 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claims 29-30 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claims 29-30 under 35 U.S.C. § 103(a) be overturned.

#### **B. Rejection of Claim 3**

Claim 3 stands rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S.

Published Application No. 2003-0004768)<sup>6</sup> and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Giles (U.S. Published Application No. 2005-0138216). Applicant respectfully submits that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper because the combination of references cited by the Examiner does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

Claim 3 depends directly from claim 2 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1-2. As set forth hereinabove in Sections VII.A.1 and 2, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 2 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 3 depends from claims 1 and 2, Applicant submits that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 3 recites patentable subject matter apart from its dependence on claims 1-2. Claim 3 recites “wherein said second network comprises an intranet.” The Examiner acknowledges that the combination of Utsugi et al, Bury et al. and Webb et al. do not disclose or suggest a system meeting the recited limitation. The Examiner asserts, however, that Giles does so and that it would be obvious to modify

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<sup>6</sup> The bolded heading for this rejection refers to “Williams” rather than “Bury et al.” Based on the context of the Office Action and the use of “Bury” in the body of the rejection, Applicant has assumed that the recitation to “Williams” in the heading is in error.



the combination of Utsugi et al., Bury et al. and Webb et al., in view of Giles to “restrict access to unauthorized users...” Office Action of May 22, 2007 p. 5, lines 1-3.

Applicant submits, however, that Giles comprises non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant’s invention, the reference must either be in the field of applicant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant’s claimed invention relates to ordering of vehicle parts for manufacture. Giles relates to management of electronic forms in remote computing devices for financial advisors. Giles, ¶ [0002]. Giles is also not reasonably pertinent to the problem with which Applicant was concerned. While Applicant’s invention is directed towards improved efficiency in orders for manufacture of vehicle parts, Giles is directed towards synchronizing data and code between remote computing devices and backend financial systems to provide for consistent financial advice. Giles, ¶ [0002]. Giles is therefore completely unrelated to the claimed invention.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 3 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 3 under 35 U.S.C. § 103(a) be overturned.

### **C. Rejection of Claims 10-11, 13-16 and 26**

Claims 10-11, 13-16 and 26 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Shields et al. (U.S. Published Patent Application No. 2004-0030614). Applicant respectfully submits that the rejection of claims 10-11, 13-16 and 26 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

#### **1. Rejection of Claims 10 and 16**

Claim 10 depends from independent claim 1 and therefore incorporates all of the limitations set forth in claim 1. Claim 16 depends from claim 10. As set forth hereinabove in Sections VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 10 and 16 depends from claim 1, Applicant submits that the rejection of claims 10 and 16 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claims 10 and 16 recites patentable subject matter apart from their dependence on claim 1. Claim 10 recites “wherein said application interface includes a plurality of tabs having identifiers, each tab of said plurality of tabs corresponding to a category of requested information from among a plurality of categories of requested information regarding said first part of said vehicle, said plurality

of tabs displayed simultaneously by said customer client together with one category of requested information from said plurality of categories of requested information, said one category of requested information selected responsive to a selection of one of said plurality of tabs by said customer through said customer client” The Examiner acknowledges that Utsugi et al., Bury et al., and Webb et al. do not disclose or suggest a system meeting the limitations of claim 10. The Examiner argues, however, that Shields et al. discloses a system with an application interface meeting the limitations of claim 10. Applicant respectfully disagrees.

Shields et al. discloses a system for managing the workload of procurement buyers within an organization. Individuals, departments, etc. within an organization submit requisitions for the purchase of various goods or services needed by the individual, department, etc. The system disclosed in Shields et al. stores these requisitions orders and related information and manages their distribution and review. Although Shields et al. discloses an interface for displaying requisition orders and the interface includes tabs with identifiers that correspond to categories of information (see Figure 2), Shields et al. does not disclose an interface in which the categories of information relate to “said first part of said vehicle” as specifically recited in claim 10. This distinction is due to the fundamentally different purpose of Shields et al. Shields et al. displays information for company buyers relating to requisition requests made within a company. The system is an internal organizational tool and is not designed for use externally like Applicant’s system which accepts applications for manufacture of parts from customers.

For similar reasons, Applicant submits that Shields comprises non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant's claimed invention relates to ordering of vehicle parts for manufacture. Shields relates to management of workloads for procurement individuals. Shields et al., ¶ [0003]. Shields et al. is also not reasonably pertinent to the problem with which Applicant was concerned. While Applicant's invention is directed towards improved efficiency in orders for manufacture of vehicle parts, Shields et al. is directed towards accumulating and routing requisition requests within an organization. Shields et al. ¶ [0016].

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claims 10 and 16 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claims 10 and 16 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claims 10 and 16 under 35 U.S.C. § 103(a) be overturned.

## **2. Rejection of Claim 11**

Claim 11 depends directly from claim 10 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 10. As set forth hereinabove in Sections VII.A.1 and VII.C.1, Applicant submits that the combination of

references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 10 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 11 depends from claims 1 and 10, Applicant submits that the rejection of claim 11 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 11 recites patentable subject matter apart from its dependence on claims 1 and 10. Claim 11 recites “wherein said plurality of tabs are displayed in a plurality of rows, each row of said plurality of rows containing at least two tabs of said plurality of tabs.” The Examiner asserts that Shields et al. disclose a system meeting the limitations recited in claim 11 citing paragraphs [0018] and [0020] in Shields et al. The paragraphs in Shields et al. cited by the Examiner, however, simply state that the information can be displayed in one or more tabs. There is absolutely no disclosure that the tabs are displayed “in a plurality of rows” nor that “each row of said plurality of rows contain[s] at least two tabs of said plurality of tabs” as specifically recited in claim 11. Applicants note that even a cursory review of Figures 2 and 4 (which show tabs in a single row) in Shields et al. demonstrates that Shields et al. do not disclose or suggest a system meeting this limitation.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 11 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 11 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 11 under 35 U.S.C. § 103(a) be overturned.

### **3. Rejection of Claim 13**

Claim 13 depends directly from claim 10 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 10. As set forth hereinabove in Sections VII.A.1 and VII.C.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 10 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 13 depends from claims 1 and 10, Applicant submits that the rejection of claim 13 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 13 recites patentable subject matter apart from its dependence on claims 1 and 10. Claim 13 recites “wherein each category of said plurality of categories of requested information includes at least one field and said first server is further configured to generate a first value for a first field responsive to receipt of a second value for a second field from said customer client.” Applicants note that Shields et al. does not even disclose or discuss the interface or means through which the person submitting the requisition places an order; rather, Shields et al. only discloses a system for organizing and displaying multiple orders that have been received. Accordingly, Shields et al. certainly do not disclose or suggest the specific system recited in claim 13 in which values in fields are automatically generated responsive to values in other fields when the application for manufacture (or, in the case of Shields, the requisition order) is being created. In the Office Action, the Examiner cites paragraph [0115] in Shields et al. for support. The cited paragraph, however, simply lists the various categories of information presented to the buyer reviewing the requisition

requests. The cited paragraph does not disclose or suggest how values are generated, much less the specific system recited in claim 13.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 13 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 13 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 13 under 35 U.S.C. § 103(a) be overturned.

#### **4. Rejection of Claim 14**

Claim 14 depends directly from claim 13 and indirectly from claim 10 and independent claim 1 and therefore incorporates all of the limitations set forth in claims 1, 10 and 13. As set forth hereinabove in Sections VII.A.1, VII.C.1 and VII.C.3, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1, 10 and 13 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 14 depends from claims 1, 10 and 13, Applicant submits that the rejection of claim 14 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 14 recites patentable subject matter apart from its dependence on claims 1, 10 and 13. Claim 14 recites “wherein said first field and said second field are both in a single category of requested information among said plurality of categories of requested information.” As discussed in Section VII.C.3, Shields et al. does not even disclose or discuss the interface or means through which the

person submitting the requisition inputs the order; rather, Shields et al. only discloses a system for organizing and displaying multiple orders that have been received. Accordingly, Shields et al. certainly do not disclose or suggest the specific system recited in claim 13 in which values in fields are automatically generated responsive to values in other fields when the application for manufacture (or, in the case of Shields, the requisition order) is being created—nor the more specific limitation of claim 14 wherein “said first field and said second field are both in a single category of requested information.”. The Examiner again cites paragraph [0115] in Shields et al. to support his position. The cited paragraph, however, simply lists the various categories of information presented to the buyer reviewing the requisition requests. The cited paragraph does not disclose or suggest how values are generated, much less the specific system recited in claim 14.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 14 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 14 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 14 under 35 U.S.C. § 103(a) be overturned.

## **5. Rejection of Claim 15**

Claim 15 depends directly from claim 13 and indirectly from claim 10 and independent claim 1 and therefore incorporates all of the limitations set forth in claims 1, 10 and 13. As set forth hereinabove in Sections VII.A.1, VII.C.1 and VII.C.3, Applicant submits that the combination of references cited by the Examiner fails to disclose or



suggest all of the limitations recited in claims 1, 10 and 13 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 15 depends from claims 1, 10 and 13, Applicant submits that the rejection of claim 15 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 15 recites patentable subject matter apart from its dependence on claims 1, 10 and 13. Claim 15 recites “wherein said first field and said second field are in different categories of requested information among said plurality of categories of requested information..” As discussed in Section VII.C.3, Shields et al. does not even disclose or discuss the interface or means through which the person submitting the requisition inputs the order; rather, Shields et al. only discloses a system for organizing and displaying multiple orders that have been received. Accordingly, Shields et al. certainly do not disclose or suggest the specific system recited in claim 15 in which values in fields are automatically generated responsive to values in other fields when the application for manufacture (or, in the case of Shields, the requisition order) is being created—nor the more specific limitation of claim 15 wherein “said first field and said second field are both in a single category of requested information.”. The Examiner again cites paragraph [0115] in Shields et al. to support his position. The cited paragraph, however, simply lists the various categories of information presented to the buyer reviewing the requisition requests. The cited paragraph does not disclose or suggest how values are generated, much less the specific system recited in claim 15.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 15 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 15 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 15 under 35 U.S.C. § 103(a) be overturned.

#### **6. Rejection of Claim 26**

Claim 26 depends directly from claim 10 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 10. As set forth hereinabove in Sections VII.A.1 and VII.C.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 10 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 26 depends from claims 1 and 10, Applicant submits that the rejection of claim 26 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 26 recites patentable subject matter apart from its dependence on claims 1 and 10. Claim 26 recites “wherein said first server is further configured to transmit an approval notification to said customer upon review of said first completed application by an approval agent of said manufacturer.”. Applicant respectfully submits that the combination of Utsugi et al., Bury et al., Webb et al. and Shields et al. does not disclose or suggest a system meeting the recited limitation.

The Examiner acknowledges that Utsugi et al., Bury et al. and Webb et al. do not disclose or suggest a system meeting the limitation recited in claim 26. The Examiner

argues that Shields et al. discloses such a system, however, citing paragraph [0054] in Shields et al. The cited paragraph, however, discloses nothing of the sort and appears to have been selected solely for its use of the term “notification.” The cited paragraph simply describes the information in requisitions available to the company buyer and describes various categories of information as including “notifications.” The cited paragraph does not disclose or suggest the concept of transmitting an approval notification to the customer (which would be the person submitting the requisition in the case of Shields) upon review of application by an approval agent of the manufacturer as recited in claim 26.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 26 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 26 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 26 under 35 U.S.C. § 103(a) be overturned.

#### **D. Rejection of Claims 17-19**

Claims 17-19 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Tanner et al. (U.S. Published Patent Application No. 2004-0243588). Applicant respectfully submits that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims

and because one of ordinary skill in the art would not combine the teachings of the cited references.

### **1. Rejection of Claims 17-18**

Claim 17 depends directly from claim 10 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 10. Claim 18 depends from claim 17. As set forth hereinabove in Sections VII.A.1 and VII.C.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 10 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 17-18 depends from claims 1 and 10, Applicant submits that the rejection of claims 17-18 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claims 17-18 recite patentable subject matter apart from their dependence on claims 1 and 10. Claim 17 recites “wherein said application interface includes an indicator indicating, simultaneously for each of said plurality of categories of requested information, whether said first server has received all requested information in said category of requested information.” Applicant respectfully submits that the combination of Utsugi et al., Bury et al., Webb et al. and Tanner et al. does not disclose or suggest a system meeting the recited limitation.

The Examiner acknowledges that Utsugi et al., Bury et al. and Webb et al. do not disclose or suggest a system meeting the limitation recited in claim 17. The Examiner argues that Tanner et al. discloses such a system, however. Tanner et al. discloses a system for administering queries to a database. The Examiner cites paragraph [0310] in

Tanner et al. to support the Examiner's arguments. The cited paragraph, however, refers to status indicators that are used by "alerters" and "supervisors" in reviewing search results obtained in response to a customer inquiry. The status indicator is not, conversely, presented to the customer nor indicative of whether the categories of information requested from the *customer* or applicant have been received in the application interface as required by claim 17.

Applicant further submits that one of ordinary skill in the art would not look to combine the teachings of Tanner et al. with those of Utsugi et al, Bury et al. and Webb et al. First, Tanner et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant's claimed invention relates to ordering of vehicle parts for manufacture. Tanner et al. relates to a system for administering a database and is unrelated to the receipt of orders for manufacture of vehicle parts. Tanner et al. is also not pertinent to the problems that Applicants were concerned with. Tanner et al. is directed towards improved correlation of search requests and results by removing false positives from the search results, a problem far removed from improving efficiency in orders for manufacture of parts. Second the Examiner's stated motivation to "provide a user or operator with the ability to readily recognize, organize, or otherwise group together particular inquiry requests or records based on their respective status condition" is wholly unrelated to the invention in

claim 17 which deals with the completion of information submitted for a single inquiry or request from the customer.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claims 17-18 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claims 17-18 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claims 17-18 under 35 U.S.C. § 103(a) be overturned.

## **2. Rejection of Claim 19**

Claim 19 depends directly from claim 17 and indirectly from claim 10 and independent claim 1 and therefore incorporates all of the limitations set forth in claims 1, 10 and 17. As set forth hereinabove in Sections VII.A.1, VII.C.1 and VII.D.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1, 10 and 17 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 19 depends from claims 1, 10 and 17, Applicant submits that the rejection of claim 19 under 35 U.S.C. § 103(a) is improper and requests that the rejection be withdrawn.

Applicant further submits that claim 19 recites patentable subject matter apart from its dependence on claims 1, 10 and 17. Claim 19 further defines the indicator recited in claim 17 as having “a plurality of members corresponding to said plurality of tabs, said plurality of members ordered in the same manner as said plurality of tabs” Tanner et al. do not disclose or suggest any correlation whatsoever between the status

indicators and user input tabs. The Examiner cites to paragraph [0310] in Tanner et al.. The cited paragraph, however, at most indicates that individual records can be color coded and then organized according to color—which is contradictory to the requirement of claim 19 that the indicators remain “ordered in the same manner as said plurality of tabs.”

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 19 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claim 19 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 19 under 35 U.S.C. § 103(a) be overturned.

#### **E. Rejection of Claims 21-25 and 31-33**

Claims 21-25 and 31-33 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Olson et al. (U.S. Published Patent Application No. 2003-0004825). Applicant respectfully submits that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

#### **1. Rejection of Claims 21-22 and 24**

Claim 21 depends from independent claim 1 and therefore incorporates all of the limitations recited in claim 1. Claims 22 and 24 depend from claim 21. As set forth

hereinabove in Sections VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 21-22 and 24 depends from claim 1, Applicant submits that the rejection of claims 21-22 and 24 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned

## **2. Rejection of claim 23**

Claim 23 depends from directly from claim 21 and indirectly from claim 1. As set forth hereinabove in Sections VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 23 depends from claim 1, Applicant submits that the rejection of claim 23 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

Applicant further submits that claim 23 recites patentable subject matter apart from its dependence on claim 1. Claim 21, from which claim 23 depends, recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, an electronic link to a prior application of said customer.” Claim 23 further recites “wherein said prior application comprises an incomplete application.” The Examiner acknowledges that the combination of Utsugi et al, Webb et al. and Bury et al. do not disclose or suggest a system meeting the recited limitations. The Examiner argues that Olson et al. discloses a system meeting the limitation, however. Applicant respectfully disagrees.



Olson et al. disclose a system for administering and processing requests for sample parts and materials. The system allows a user to access previous project information. Olson et al. ¶ [0070]. Olson et al. does not disclose or suggest, however, that the user can access incomplete projects or applications. The Examiner cites paragraph [0067] in Olson et al. as disclosing a system meeting the limitation of claim 23. The cited paragraph, however, describes a system for notifying a user of errors and providing customer assistance. The cited paragraph has nothing whatsoever to do with the limitation recited in claim 23.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 23 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 23 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 23 under 35 U.S.C. § 103(a) be overturned.

### **3. Rejection of claim 25**

Claim 25 depends from independent claim 1. As set forth hereinabove in Sections VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 25 depends from claim 1, Applicant submits that the rejection of claim 25 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

Applicant further submits that claim 25 recites patentable subject matter apart from its dependence on claim 1. Claim 25 recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to prior applications of said customer and to order said electronic links in accordance with one of a plurality of criteria selected by said customer through said customer client.” The Examiner acknowledges that the combination of Utsugi et al, Webb et al. and Bury et al. do not disclose or suggest a system meeting the recited limitations. The Examiner again argues that Olson et al. discloses a system meeting the limitation, however. Applicant respectfully disagrees.

Olson et al. disclose a system for administering and processing requests for sample parts and materials. Olson et al. does not disclose or suggest, however, a system that both provides a user with links to prior applications of the user and orders those links according to user-specified criteria as recited in claim 25. In the Office Action of May 22, 2007, the Examiner cites paragraph [0070] and [0080] in Olson et al. as disclosing a system meeting the limitation of claim 25. To the extent it can even be said that these paragraphs discloses a system that produces electronic links to prior applications, there is simply no disclosure or suggestion of ordering of the links—much less ordering based on customer criteria as recited in claim 25.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 25 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claim 25 under 35 U.S.C. § 103(a) is improper.

Accordingly, Applicant requests that the rejection of claim 25 under 35 U.S.C. § 103(a) be overturned.

#### **4. Rejection of claim 31**

Claim 31 depends directly from claim 30 and indirectly from claims 29 and 1. As set forth hereinabove in Sections VII.A.1 and VII.A.3, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 29 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 31 depends from claims 1 and 29, Applicant submits that the rejection of claim 31 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

Applicant further submits that claim 31 recites patentable subject matter apart from its dependence on claim 1. Claim 30, from which claim 31 depends, recites “wherein said first server transmits an application notification to said manufacturer client upon receipt of said first completed application.” Claim 31 further recites “wherein said application notification includes an electronic link to said first completed application.” The Examiner acknowledges that the combination of Utsugi et al, Webb et al. and Bury et al. do not disclose or suggest a system meeting the recited limitations. The Examiner argues that Olson et al. discloses a system meeting the limitation, however. Applicant respectfully disagrees.

The Examiner cites paragraphs [0061], [0067] and [0070] in Olson et al. as disclosing a system meeting the limitation of claim 31. To the extent the cited paragraphs can be said to disclose “electronic links” that are transmitted, however, the links are

directed at the users who entered the information—not to a client computer of the manufacturer as recited in claim 30 from which claim 31 depends. Applicant notes that Olson et al. does describe transmission of information to the manufacturers in paragraphs [0074]-[0076]. This information does not comprise a link to a “completed application” submitted through the system, but rather reformatted data in accordance with the format requested by the manufacturer.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 31 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 31 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 31 under 35 U.S.C. § 103(a) be overturned.

#### **5. Rejection of claim 32**

Claim 32 depends from directly from claim 29 indirectly from independent claim 1. As set forth hereinabove in Sections VII.A.1 and VII.A.3, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 29 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 32 depends from claims 1 and 29, Applicant submits that the rejection of claim 32 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

Applicant further submits that claim 32 recites patentable subject matter apart from its dependence on claim 1. Claim 32 recites “wherein said first server is further

configured to transmit to said manufacturer client first and second electronic links to said first completed application and a second completed application, respectively, each of said first and second completed applications associated with an approval agent.” The Examiner acknowledges that the combination of Utsugi et al, Webb et al. and Bury et al. do not disclose or suggest a system meeting the recited limitations. The Examiner argues that Olson et al. discloses a system meeting the limitation, however. Applicant respectfully disagrees.

The Examiner cites paragraphs [0070] and [0080] in Olson et al. as disclosing a system meeting the limitation of claim 32. To the extent the cited paragraphs can be said to disclose “electronic links” that are transmitted, however, the links are directed at the users who entered the information—not to a client computer of the manufacturer as recited in claim 32. Applicant notes that Olson et al. does describe transmission of information to the manufacturers in paragraphs [0074]-[0076]. This information does not comprise a link to a “completed application” submitted through the system, but rather reformatted data in accordance with the format requested by the manufacturer. Further, there is simply no disclosure or suggestion of associating the applications to which the links are directed with an approval agent as recited in claim 32.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 32 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 32 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 32 under 35 U.S.C. § 103(a) be overturned.

## **6. Rejection of claim 33**

Claim 33 depends from directly from claim 32 indirectly from claim 29 and independent claim 1. As set forth hereinabove in Sections VII.A.1, VII.A.3, and VII.E.5 Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1, 29 and 32 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 33 depends from claims 1, 29 and 32, Applicant submits that the rejection of claim 33 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

Applicant further submits that claim 33 recites patentable subject matter apart from its dependence on claim 1. Claim 33 recites “wherein said first server is further configured to order said first and second electronic links in accordance with one of a plurality of criteria selected by said approval agent through said manufacturer client.” The Examiner acknowledges that the combination of Utsugi et al, Webb et al. and Bury et al. do not disclose or suggest a system meeting the recited limitations. The Examiner argues that Olson et al. discloses a system meeting the limitation, however. Applicant respectfully disagrees.

The Examiner again cites paragraphs [0070] and [0080] in Olson et al. as disclosing a system meeting the limitation of claim 33. Neither of these paragraphs, however, disclose or suggest any ordering of electronic links—much less ordering the links “in accordance with one of a plurality of criteria selected by said approval agent through said manufacturer client” as recited in claim 33.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 33 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claim 33 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 33 under 35 U.S.C. § 103(a) be overturned.

#### **F. Rejection of Claims 27-28**

Claims 27-28 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and furthering view of Shields (U.S. Published Patent Application No. 2004-0030614) and further in view of Olson et al. (U.S. Published Patent Application No. 2003-0004825). Applicant respectfully submits that the rejection of claims 27-28 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

##### **1. Rejection of Claim 27**

Claim 27 depends from directly from claim 26 indirectly from independent claim 1. As set forth hereinabove in Sections VII.A.1 and VII.C.6, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 26 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 27 depends from claims 1 and 26, Applicant submits

that the rejection of claim 27 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

## **2. Rejection of Claim 28**

Claim 28 depends from independent claim 1. As set forth hereinabove in Sections VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and, further, that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 28 depends from claim 1, Applicant submits that the rejection of claim 28 under 35 U.S.C. § 103(a) is improper and requests that the rejection be overturned.

Applicant further submits that claim 28 recites patentable subject matter apart from its dependence on claim 1. Claim 28 recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to a subset of prior applications of said customer, said subset created responsive to search data provided by said customer.” The Examiner acknowledges that the combination of Utsugi, et al., Bury et al., Webb et al. and Shields et al. do not disclose or suggest a system meeting the recited limitation. The Examiner asserts, however, that Olson et al. disclose a system meeting the recited limitation. Applicant respectfully disagrees.

The Examiner cites paragraph [0080] in Olson et al. as disclosing a system meeting the recited limitation. Paragraph [0080], however, only discloses the automated transmission of messages “pushed” to users. The cited paragraph does not disclose or suggest transmission of information in response to user requests, much less a subset of



prior applications of the customer or a creation of a subset responsive to search data provided by the user. There is simply no disclosure or suggestion of these features whatsoever in the cited paragraph. Paragraph [0070] indicates that a user can obtain access to prior project data, but does not disclose or suggest a system in which a subset of prior applications or projects can be generated responsive to user defined search criteria.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 28 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 28 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 28 under 35 U.S.C. § 103(a) be overturned.

#### **G. Rejection of Claims 8-9**

Claims 8-9 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Brickell et al. (U.S. Published Patent Application No. 2003-0115142). Applicant respectfully submits that the rejection of claims 8-9 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

Claims 8-9 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove in Section VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicant also submits that there is no

suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 8-9 depend from claim 1, Applicant submits that the rejection of claims 8-9 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicant further submits that claims 8-9 recite patentable subject matter apart from their dependence on claim 1. In particular, Applicant submits that one of ordinary skill in the art would not look to combine the teachings of Brickell et al. with those of Utsugi et al, Bury et al. and Webb et al because Brickell et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant's claimed invention relates to ordering of vehicle parts for manufacture. Brickell et al. relates to the field of system user authentication. Brickell et al. is also not pertinent to the problems that Applicants were concerned with. Brickell et al. is directed towards solving the problem of developing a flexible security system for new technologies rather than efficient handling of orders for manufacture of parts. See Brickell et al. para. [0005] as opposed to improving efficiency in orders for manufacture of parts.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claims 8-9 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant

respectfully submits that the rejection of claims 8-9 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claims 8-9 under 35 U.S.C. § 103(a) be overturned.

#### **H. Rejection of Claims 4-5 and 7**

Claims 4-5 and 7 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Schuyler et al. (U.S. Patent No. 6,832,202). Applicant respectfully submits that the rejection of claims 4-5 and 7 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

##### **1. Claims 4-5**

Claims 4-5 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove in Section VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicant also submits that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 4-5 depend from claim 1, Applicant submits that the rejection of claims 4-5 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

##### **2. Claim 7**

Claim 7 depends from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove in Section VII.A.1, Applicant

submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicant also submits that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 7 depends from claim 1, Applicant submits that the rejection of claim 7 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicant further submits that claim 7 recites patentable subject matter apart from its dependence on claim 1. Claim 7 recites “wherein said first server is further configured to transmit an approval notification to said customer client if said information in said first completed application meets predetermined conditions and to transmit an application notification to an approval agent if said information in said first completed application does not meet said predetermined conditions.” The Examiner acknowledges that the combination of Utsugi et al., Bury et al. and Webb et al. do not disclose or suggest a system meeting the recited limitation. The Examiner asserts, however, that Schuyler et al. discloses a system meeting the recited limitation and that it would be obvious to combine the teachings of Schuyler et al. with those of Utsugi et al., Bury et al., and Webb et al. Applicant respectfully disagrees.

Schuyler et al. discloses a system for routing requests for approval in which the requests are automatically routed to appropriate agents. In the system disclosed in Schuyler et al., however, every request is routed to at least one agent. Figure 3, block 116. Schuyler et al. do not disclose or suggest a system in which some applications are approved (and therefore bypass the approval agents) when the application or request

meets predetermined conditions and routed only when the application does not meet the predetermined conditions as recited in claim 7.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 7 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 7 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 7 under 35 U.S.C. § 103(a) be overturned.

#### **I. Rejection of Claim 6**

Claim 6 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Schuyler et al. (U.S. Patent No. 6,832,202) and further in view of Haines et al. (U.S. Published Patent Application No. 2002-0072998). Applicant respectfully submits that the rejection of claim 6 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

Claim 6 depends directly from claim 4 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 4. As set forth hereinabove in Section VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicant also submits that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 6 depends

from claim 1, Applicant submits that the rejection of claim 6 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicant further submits that claim 6 recites patentable subject matter apart from its dependence on claim 1. Claim 4, from which claim 6 depends, recites “said first server further configured to access said data structure and transmit an application notification to said approval agent upon receipt of said completed application.” Claim 6 recites “wherein said application notification includes an electronic link to said first completed application.” The Examiner acknowledges that the combination of Utsugi et al., Bury et al., Webb et al. and Schuyler et al. do not disclose or suggest a system meeting the recited limitation. The Examiner asserts, however, that Haines et al. discloses a system meeting the recited limitation and that it would be obvious to combine the teachings of Haines et al. with those of Utsugi et al., Bury et al., Webb et al. and Schuyler et al. Applicant respectfully disagrees.

Haines et al. discloses a system for ordering consumables. The Examiner cites paragraph [0089] in Haines et al. as disclosing a system meeting the limitations recited in claim 6. Applicants respectfully submit that the cited paragraph does not disclose the claimed system. The claimed system refers to an “application notification” sent to an “approval agent” (see claim 4) for the application after completion of the application by the customer. In the embodiment of the invention recited in claim 6, this “application notification” includes a link to the application completed by the customer. The cited paragraph in Haines et al. discloses a completely different concept. The cited paragraph describes emails that are sent from a seller of consumables *to* a customer and that contains links to websites enabling orders of the consumables *by the customer*. The

claimed invention and the cited paragraph in Haines et al. therefore describe completely different concepts.

Applicant further submits that one of ordinary skill in the art would not look to combine the teachings of Haines et al. with those of Utsugi et al., Bury et al., Webb et al. and Schuyler et al. In particular, Haines et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant's claimed invention relates to ordering of vehicle parts for manufacture. Haines et al. relates to ordering of pre-manufactured "consumables" rather than the applications for manufacture of vehicle parts. Haines et al., ¶ [0002]. Further, Haines et al. is directed towards solving the problem of automating consumables ordering rather than efficient handling of orders for manufacture of parts. See Haines et al. ¶ [0006].

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 6 and because one of ordinary skill in the art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 6 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 6 under 35 U.S.C. § 103(a) be overturned.

#### **J. Rejection of Claim 20**

Claim 20 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Bury et al. (U.S. Published Application No. 2003-0004768) and further in view of Webb et al. (U.S. Published Application No. 2001-0049644) and further in view of Reichwein (U.S. Published Patent Application No. 2002-0040328). Applicant respectfully submits that the rejection of claim 20 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because one of ordinary skill in the art would not combine the teachings of the cited references.

Claim 20 depends from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. As set forth hereinabove in Section VII.A.1, Applicant submits that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicant also submits that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 20 depends from claim 1, Applicant submits that the rejection of claim 20 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicant further submits that claim 20 recites patentable subject matter apart from its dependence on claim 1 because one of ordinary skill in the art would not look to combine the teachings of Reichwein et al. with those of Utsugi et al, Bury et al., and Webb et al. In particular, Reichwein et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor



or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicant's claimed invention relates to ordering of vehicle parts for manufacture. Reichwein et al. is directed to a system for servicing vehicles and other equipment in which a portion of the system enables transmission of data relating to vehicle operating conditions over a network to a service center. The system in Reichwein et al. has nothing to do with parts manufacturing and the information transmitted in the claimed system and in the system of Reichwein et al. would be entirely different. Further, Reichwein et al. is not reasonably pertinent to the problem with which applicant was concerned. Applicant's claimed invention is directed to improving efficiency in requests for manufacture of parts. Reichwein et al. is directed towards improved coordination of equipment service operations. Applicants note in this regard that the Examiner's stated motivation for combining the teachings of Reichwein et al. with Utsugi et al., Bury et al. and Webb et al. (i.e. "to obtain information without the need for the presence of a representative of the repair shop" Office Action of May 22, 2007 p. 24) has nothing whatsoever to do with the ordering of manufactured parts as claimed by Applicant nor with the ordering system provided by Utsugi et al. The system in Utsugi et al. has absolutely nothing to do with servicing parts. Accordingly, Applicants respectfully submit that one of ordinary skill in the art would have no motivation to modify Utsugi et al., Bury et al. and Webb et al. based on the teachings of Reichwein et al. as suggested by the Examiner.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in claim 20 and because one of ordinary skill in the

art would not be motivated to combine the teachings of the cited references, Applicant respectfully submits that the rejection of claim 20 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicant requests that the rejection of claim 20 under 35 U.S.C. § 103(a) be overturned.

Respectfully submitted,

/William F. Kolakowski III/

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## VIII. CLAIMS APPENDIX

1. A system for processing applications from customers for manufacture of vehicle parts by a manufacturer, comprising:

a first server configured to generate an application interface on a customer client in communication with said first server through a first network and to receive a first completed application for manufacture of a first part of a vehicle from said customer through said customer client using said application interface, said first completed application having information including a first set of information regarding operating conditions of said vehicle, a second set of information defining specifications for said first part, and a third set of information regarding a second part of said vehicle functionally interrelated with said first part of said vehicle.

2. The system of claim 1, further comprising:

a second server in communication with said first server over one of said first network and a second network; and,

a database that stores said information, said database accessible by said second server.

3. The system of claim 2 wherein said second network comprises an intranet.

4. The system of claim 1, further comprising a data structure that associates said first completed application with an approval agent, said first server further configured to access said data structure and transmit an application notification to said approval agent upon receipt of said completed application.

5. The system of claim 4 wherein said data structure associates said application with said approval agent based on an identity of said customer.

6. The system of claim 4 wherein said application notification includes an electronic link to said first completed application.

7. The system of claim 1 wherein said first server is further configured to transmit an approval notification to said customer client if said information in said first completed application meets predetermined conditions and to transmit an application notification to an approval agent if said information in said first completed application does not meet said predetermined conditions.

8. The system of claim 1 wherein said first server is further configured to authenticate first and second forms of identification for said customer received from said customer client and that said first form of identification corresponds to said second form of identification.

9. The system of claim 8 wherein said first server is further configured to transmit said second form of identification corresponding to said first form of identification to a predetermined location designated by said customer upon receipt of said first form of identification from said customer through said customer client.

10. The system of claim 1 wherein said application interface includes a plurality of tabs having identifiers, each tab of said plurality of tabs corresponding to a category of requested information from among a plurality of categories of requested information regarding said first part of said vehicle, said plurality of tabs displayed simultaneously by said customer client together with one category of requested information from said plurality of categories of requested information, said one category of requested information selected responsive to a selection of one of said plurality of tabs by said customer through said customer client.

11. The system of claim 10 wherein said plurality of tabs are displayed in a plurality of rows, each row of said plurality of rows containing at least two tabs of said plurality of tabs.

13. The system of claim 10 wherein each category of said plurality of categories of requested information includes at least one field and said first server is further configured to generate a first value for a first field responsive to receipt of a second value for a second field from said customer client.

14. The system of claim 13 wherein said first field and said second field are both in a single category of requested information among said plurality of categories of requested information.

15. The system of claim 13 wherein said first field and said second field are in different categories of requested information among said plurality of categories of requested information.

16. The system of claim 10 wherein at least one category of said plurality of categories of requested information includes at least one field and said at least one field includes a menu offering a plurality of possible values for said at least one field.

17. The system of claim 10 wherein said application interface includes an indicator indicating, simultaneously for each of said plurality of categories of requested information, whether said first server has received all requested information in said category of requested information.

18. The system of claim 17 wherein said indicator displays one of two colors for each of said plurality of categories of requested information.

19. The system of claim 17 wherein said indicator includes a plurality of members corresponding to said plurality of tabs, said plurality of members ordered in the same manner as said plurality of tabs.

20. The system of claim 1 wherein said vehicle part is one of a steer axle, a drive axle, a trailer axle and a brake.

21. The system of claim 1 wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, an electronic link to a prior application of said customer.

22. The system of claim 21 wherein said prior application comprises a second completed application.

23. The system of claim 21 wherein said prior application comprises an incomplete application.

24. The system of claim 21 wherein said first server is further configured, responsive to a request received from said customer client, to create a new application by copying said prior application

25. The system of claim 1 wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to prior applications of said customer and to order said electronic links in accordance with one of a plurality of criteria selected by said customer through said customer client.

26. The system of claim 1 wherein said first server is further configured to transmit an approval notification to said customer upon review of said first completed application by an approval agent of said manufacturer.

27. The system of claim 26 wherein said approval notification includes an electronic link to said first completed application.

28. The system of claim 1 wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to a subset of prior applications of said customer, said subset created responsive to search data provided by said customer.

29. The system of claim 1, further comprising a manufacturer client in communication with said first server over one of said first network and a second network.

30. The system of claim 29 wherein said first server transmits an application notification to said manufacturer client upon receipt of said first completed application.

31. The system of claim 30 wherein said application notification includes an electronic link to said first completed application.

32. The system of claim 29 wherein said first server is further configured to transmit to said manufacturer client first and second electronic links to said first completed application and a second completed application, respectively, each of said first and second completed applications associated with an approval agent.

33. The system of claim 32 wherein said first server is further configured to order said first and second electronic links in accordance with one of a plurality of criteria selected by said approval agent through said manufacturer client.

**IX. EVIDENCE APPENDIX**

**[NONE]**



**X. RELATED PROCEEDINGS APPENDIX**

**[NONE]**

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